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June 15, 1989
RP:0107

District Engineer (PODCO-O)
U.S. Army Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858

Dear Sir:

Application for Army Permit #2090
Oahu Intraisland Ferry System
Maunalua Bay Terminal
Honolulu, Oahu

The applicant proposes to construct a ferry terminal adjacent to the Maunalua Bay Beach Park in order to provide "rush hour" services between Hawaii Kai and downtown. The siting of the terminal at Maunalua Bay requires building of a 200-ft-long pier and a 500-ft-long revetment, the dredging of the entrance channel and turning basin, and ocean disposal of the excess dredged spoils.

We have reviewed the Draft Environmental Impact Statement (EIS). A copy of our comments and the response to our comments are enclosed for your information. Three of our concerns, which are pertinent to this application, deserve special emphasis:

1. The shoreline at Portlock, including the inlet to the Hawaii Kai Marina is unstable and subject to shoaling. This problem dates from at least the early 1970's. The relationship between water circulation and sand transport in this area is not sufficiently well known to be able to state with confidence what the effects of the proposed project will be. However, any removal of sand and limestone from the reef flat will have a direct effect on conditions of the shoreline.

The Final EIS, Unresolved Issues, page D-29 states: "With regard to dredging the sandy shoal in the channel, the relationship of dynamic equilibrium between [sic] if and with the beach is uncertain. The possibility for subtle long-term acceleration of erosion exists."

2. According to the PODCO Public Notice, the National Marine Fisheries Services will be consulted during the "Section 7" review process. However, we would like to reiterate our concerns in regards to the green sea turtles.

The green sea turtle study, which was appended to the Final EIS, indicates that there are potential impacts to the endangered turtles. According to page 28, this is related "primarily to the proposed modifications to the entrance channel because of proximity to resident turtles. One potentially adverse condition could occur with the generation of turbidity with channel dredging...." Additional concerns focus on explosives, which, "if improperly used, could kill nearby turtles". While actions will be taken to mitigate possible turtle kills, the potential for such an occurrence still remains.

According to this study, page 30, "the greatest potential negative impact to green turtles ... may come through the operation of high speed vessels in the area. Among the vessels in this category would be the proposed ferry." The study states, that as the ferry transits the nesting areas, "turtles could be possibly run over causing mortality." In order to "alleviate" [but not eliminate] this potential problem, it was recommended that the ferry "take the shortest course to transit the areas known to be used by green turtles."

While the turtles "are apparently coexisting with man in an area that has received a considerable level of disturbance;" the modification of the channel and operation of the ferry will place added stress on the turtle population.

3. We stated in our comments on the Draft EIS, that at the the proposed \$2.50 fare, 68.4 percent of the people surveyed (based on the survey results conducted for DOT (Appendix A, FEIS)), have expressed "zero interest" in the ferry system. [Even at the \$1.00 fare, more that 50 percent expressed zero or low interest.] The Department of Transportation did not refute our comment.

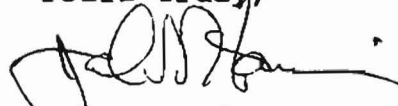
Also, it appears that only "holders of a valid Hawaii driver's license [will receive] a discounted fare of not greater than \$2.50 one way.... Other potential riders without a valid Hawaii driver's license, such as students and senior citizens already have reduce fares ... on other means of mass transits." There are many other residents, besides students and senior citizens, who may wish to utilize the services of the ferry system, but do not have a valid Hawaii driver's license. It seems apparent that the only real beneficiaries of this proposed project will be Hawaii licensed drivers, commuting between Hawaii Kai and downtown, (initial ridership is estimated at 250-450 persons per day), and the ferry operators.

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In conclusion, the PODCO Public Notice states: "The decision whether or not to issue a permit will reflect an evaluation of relevant factors and a weighing and balancing of reasonable foreseeable benefits expected to accrue to the public interest for the proposed activity against reasonable foreseeable detriments." Considering the concerns we have expressed, we question whether the potential benefits of the proposed project outweigh its potential impacts.

Thank you for the opportunity to comment on this PODCO.

Yours truly,



John Harrison
Environmental Coordinator

Attachments

cc: Department of Transportation

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